

**Baker & Hostetler LLP**

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**Hearing Date: July 29, 2015 at 10:00 a.m.**

**Objection Due: July 22, 2015 at 5:00 p.m.**

*Attorneys for Irving H. Picard, Trustee for the  
Substantively Consolidated SIPA Liquidation of  
Bernard L. Madoff Investment Securities LLC and Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation  
of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

PLAZA INVESTMENTS INTERNATIONAL  
LIMITED, and NOTZ, STUCKI MANAGEMENT  
(BERMUDA) LIMITED

Defendants.

Adv. Pro. No. 10-04284 (SMB)

**NOTICE OF MOTION FOR ENTRY OF AN ORDER PURSUANT TO  
SECTION 105(a) OF THE BANKRUPTCY CODE AND RULES 2002  
AND 9019 OF THE FEDERAL RULES OF BANKRUPTCY PROCEDURE  
APPROVING A SETTLEMENT AGREEMENT BY AND AMONG  
THE TRUSTEE AND PLAZA INVESTMENTS INTERNATIONAL LIMITED,  
AND NOTZ, STUCKI MANAGEMENT (BERMUDA) LIMITED**

PLEASE TAKE NOTICE that Irving H. Picard (the “Trustee”), as trustee for the liquidation of Bernard L. Madoff Investment Securities LLC (“BLMIS”) under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa-III, and the substantively consolidated estate of Bernard L. Madoff (“Madoff”), by and through his undersigned counsel, will move before the Honorable Stuart M. Bernstein, United States Bankruptcy Judge, at the United States Bankruptcy Court, the Alexander Hamilton Customs House, One Bowling Green, New York, New York 10004, on July 29, 2015 at 10:00 a.m., or as soon thereafter as counsel may be heard, seeking entry of an order, pursuant to section 105(a) of the United States Bankruptcy Code and Rules 2002 and 9019 of the Federal Rules of Bankruptcy Procedure, approving a certain settlement agreement by and among the Trustee and Plaza Investments International Limited (“Plaza”), and Notz, Stucki Management (Bermuda) Limited (“NSMB”), as more particularly set forth in the motion annexed hereto (the “Motion”).

PLEASE TAKE FURTHER NOTICE that written objections to the Motion must be filed with the Clerk of the United States Bankruptcy Court, One Bowling Green, New York, New York 10004 by no later than **5:00 p.m. on July 22, 2015** (with a courtesy copy delivered to the Chambers of the Honorable Stuart M. Bernstein) and must be served upon (a) Baker & Hostetler LLP, 45 Rockefeller Plaza, New York, New York 10111, Attn: Mark A. Kornfeld and Elizabeth A. Scully; (b) Debevoise & Plimpton, LLP, 919 Third Avenue, New York, NY 10022, Attn: Joseph P. Moodhe, J. Robert Abraham and Shannon R. Selden; and (c) Securities Investor Protection Corporation, 805 Fifteenth Street, N.W., Suite 800, Washington, DC 20005, Attn:

Kevin Bell. Any objections must specifically state the interest that the objecting party has in these proceedings and the specific basis of any objection to the Motion.

PLEASE TAKE FURTHER NOTICE that failure to file timely objections may result in the entry of an order granting the relief requested in the Motion without further notice to any party or an opportunity to be heard.

Dated: New York, New York  
June 19, 2015

Respectfully submitted,

BAKER & HOSTETLER LLP

By: s/ Elizabeth A. Scully

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--and--

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SIPA Liquidation of the estate of Bernard L.  
Madoff Investment Securities LLC and the  
estate of Bernard L. Madoff*